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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

Feb 8, 2008

FEB 08 2008 *new*

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

John V. Norris

NA

NA

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

08CV847

JUDGE GUZMAN

MAGISTRATE JUDGE ASHMAN

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

(former) Will County

Public Defender Assistant

Keith F. Jones

(hereafter Jones)

NA

NA

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

X COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

_____ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

_____ OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: John V. Norris
- B. Date of Birth: March 23, 1965
- C. List all aliases: Vincent Norris
- D. Prisoner identification number: 07-5989
- E. Place of present confinement: Will County Adult Detention Facility
- F. Address: 95^s Chicago str Joliet, IL 60436

(If there is more than one plaintiff, then each plaintiff must list his or her name, date of birth, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Keith F. Jones
 Title: (former) Assistant Public Defender
 Place of Employment: Will County Public Defenders Office
- B. Defendant: NA
 Title: NA
 Place of Employment: NA
- C. Defendant: NA
 Title: NA
 Place of Employment: NA

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Norris v WCAEF 06-SC-3750, 4371, 6856, Norris v Ferro et al 06-SC-5791, Norris v Will County 07-C-5461, Norris v Ferro et al 06-C-2793.
- B. Approximate date of filing lawsuit: Summer 06, 07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: None
- D. List all defendants: WCAEF, Will County, City of Joliet Police Officer Francis Ferro
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Will County, U.S. District Court North IL East Div.
- F. Name of judge to whom case was assigned: Judge Egan Will County, Judge Cox, Manning and Denlow, Kendall U.S. Dist. Court
- G. Basic claim made: Ineffective assistance of counsel, Tort Attorney Malpractice, Breach Fiduciary relationship, constitutional rights deprivation, Intentional infliction of emotional distress, Conspiracy, Willful misconduct, Gross negligence, Wanton Conspiracy.
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): 04-CF-1803 Nolle prosequied 8-21-06, 04-CF-1961 still pending in Third Appellate Court District
- I. Approximate date of disposition: 05-CF-1803 dismissed 8-21-06, 04-CF-1961 still pending.

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

- ① The Will County Public Defenders Office, Assistant Keith Fredrick Jones (Jones) was appointed by the Will County Courts to defend me Will County cases 04-CF-1961 and 05-CF-1803.
- ② In case 04-CF-1961, Jones had me to Blind plea guilty. While perscribed unknown pain medicine. Jones told me I would get probation. On 8-27-05 I was re-arrested for 05-CF-1803. Will County Assistant State's Attorney James M. Long (Long) pushed for trial on 05-CF-1803 case. On 11/14/05 Monday Trial day Long called in sick, he also took Prosecution file of 05-CF-1803 home Friday 11/11/05, Continuance. In 12/2005 Long is now pushing for a sentence in 04-CF-1961 case. I asked Jones to file motion to withdraw guilty plea, motion to dismiss, and motion for Retention of property. Jones refused. I sent in Lay knowledge motions. Jones refused to argue my motions. I declared Jones ineffective and asked to represent myself. Judge Rozak denied me but, let me argue my motions. Judge Rozak repeatedly rudely interrupted me. Jones refused to assist me. During my presentation of my motion to withdraw Jones I think said he doubted that I had a Bona fide claim of pain medicine fitness issues. WHY? On 12/28/05 Judge Rozak ordered

a fitness exam to determine how the the unknown pain medicine affected my ability to understand Court proceedings on 6/17/05 specifically. Everything was put on hold. Will County Public Defender investigator Ms. Stacey Dewault got my Northwestern Memorial Hospital records for me after Jones refused to. He wouldn't give me Dewault's name. But I found it on related documents. Dr. Randi Zoot Clinical Psychologist came and examined me. She reported that she could not make the determination the Court wanted. Then suggested I see a Medical doctor. On 3/6/06 Long suggested to Judge Rozak to alter the fitness exam parameters. I asked Jones to object he refused to. I asked Jones to object to Long and Judge Rozak not following Dr. Zoot's recommendation. Jones refused to. **WHY?** I think I asked Judge Rozak to speak in Court. Judge Rozak denied me saying not while my fitness is in question. Which was not the issue when the first fitness exam was ordered. Judge Rozak just lied! Judge Rozak then followed Long's suggestion ordering a altered fitness exam to determine if I'm sane or not. Not how unknown pain medicine affected me on 6/17/05 specifically. Hospital records reveal unknown pain medicine is Vicodin. I asked Jones to tender in open Court Medical reports on Vicodin from Psychology Today and WebMD.com/drugs. Jones refused. Shortly after Dr. Zoot came to administer the altered fitness exam. I REFUSED TOO! I gave Dr Zoot a statement and then explained why I was refusing her examination. I gave her

a copy of the Hospital report from Dewault and previously mentioned
Medical reports on Vicodin. On 4/3/06 Judge Rozak, Long and Jones
tried to convince me to cooperate with the alter Fitness exam I
refused too. I also sent in a motion for a 6 person jury for my up
coming Fitness hearing. Judge Rozak canceled it Jones ignored it.
On 4/12/06 prior to the Fitness hearing Long and Jones repeatedly went
somewhere else back and forth. When the Fitness hearing began Dr.
Zoot was brought in. Long questioned her. Judge Rozak asked if
Jones had any questions for Dr. Zoot. Jones said none your Honor,
WHY NOT? Why not question Clinical Psychologist Dr. Zoot about
Vicodin's affect on people? Epecially when Jone has Medical
reports from PSYCHOLOGY TODAY and Web MD.com/drugs,
Why not question her about her recommendation for me to be
examined by a Medical Doctor? Conspiracy, Breach fiduciary
relationship, Ineffective assistance of Counsel, Malicious
prosecution THATS WHY and more! Judge Rozak found me
fit. On his way out of the Courtroom, Jones stopped, turned,
looked me straight in the eye, Smiled, then exited. Shortly
after my Mom Naomi Norris hired paid Lawyer Kurt A. Leinweber
(Kurt) On 6-16-06 Judge Rozak sentenced me to 3 years in
prison in 04-CF-1961. I appealed the case, its still pending
in the 3rd Appellate District. If Jones would have did his duty
I would have got my guilty plea back, dismissed 05-CF-1803

and got sentenced to probation. If Jones would have did his duty, I would not have Blind plead guilty. Ineffective assistance of Counsel, Malfeasance, Intentional infliction of emotional stress, Conspiracy, Legal malpractice.

③ In the 05-CF-1803 case. I discovered that my discovery was missing Grand jury Transcripts. I asked Jones to get them for me. Jones refused. So I sent in a Lay knowledge pro se motion asking for them. Long gave them to Jones. Jones gave them to me saying, "You ordered these." Upon reading the Grand jury Transcripts I found a lie. A lie implicating me, by the City of Joliet Cop that arrested me. I showed it to Jones and asked him to file a motion to dismiss for perjured Grand jury testimony. Jones refused to. I then sent in a Lay knowledge pro se motion to dismiss the 05-CF-1803 case. Jones refused to argue it. Judge Rozak ignored and canceled it. Two hundred thirty days later on 8-21-06 Long moved the Court to Nolle prosequi the case, Judge Rozak granted it. I have just been cheated, hoodwinked, bamboozled, violated and, Railroaded by co-conspirators Judge Rozak, Long and Jones. Will County trusted public servants to 3 years in prison where I was suppose to have gotten probation. When they all KNEW I am innocent of 05-CF-1803, (06-C-2793 Norris v. Ferro et al. stem from this too.) They held me in custody with the 05 case until they got a sentence on the 04 case.

- ④ I was in Court in 11-2007. I seen co-defendant Charles A. Hinch in Court. He has not been sentenced yet in 05-CF-1802, WHY? Hinch Blind plead guilty in 10-2005. Rumar has it Hinch made a deal to testify against me for probation. And if he would tell Judge Rozak, Long what his story is on he and I being arrested for Retail theft on 8-27-05. This is a Bruton violation/Ex parte communication. Jones said nothing to me about this bit of news too. I found out from other pretrial detainees in the Will County jail.
- During this unfortunate time for me. I wrote a Complaint letter to Chief Judge of Will County Courts Steven D. White. Also I wrote a complaint letter to Will County Public Defender John C. Phren (I think this is his name). I complained to the Illinois Attorney General, The Attorney Registration and disciplinary Commission, the Judicial inquiry board, the U.S. Dept of Justice, all for nothing. I feel I wasted time, energy, and postage fees writing asking for help, for Justice! All these different places did was basically send me the standard sorry dude, try over somewhere else letter. Good luck.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Two million one hundred Fifty thousand dollars in
Keith F. Jones former official capacity. Two million
one hundred fifty thousand dollars in Keith F. Jones
individual capacity. To be paid off in one check
forthwith. Plus all fees and expenses.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 4 day of Feb, 20 08

NA

John V. Norris
 (Signature of plaintiff or plaintiffs)

John V. Norris
 (Print name)

07-5989
 (I.D. Number)

WCADE

95^S Chicago street

Joliet, IL 60436
 (Address)

— Defendant Address —

Will County Public Defender Office suite 210
Attn: (former) Assistant Public defender
Mr. Keith F. Jones
58^E Clinton street
Joliet, IL 60432

Mr. Jones is no longer employed as a Public Defender.
He is in private practice.

Law Office of
Keith Jones, P.C.
1000 Essington road.
Joliet, IL 60435
(815) 725-7322 phone
(815) 744-1681 Fax
After 5pm (866) 812-8258 phone